

Barry N. Seidel (BS-1945)  
Shaya M. Berger (SB-5387)  
DICKSTEIN SHAPIRO LLP  
1633 Broadway  
New York, New York 10019-6708  
Telephone: (212) 277-6500  
Facsimile: (212) 277-6501

Attorneys for Motors Liquidation  
Company GUC Trust

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

	-----X	
	:	
<b>In re</b>	:	<b>Chapter 11 Case No.</b>
	:	
<b>MOTORS LIQUIDATION COMPANY, et al.,</b>	:	<b>09-50026 (REG)</b>
<b>f/k/a General Motors Corp., et al.</b>	:	
	:	
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>
	:	
	-----X	

**CERTIFICATE OF NO OBJECTION RECEIVED AS TO MOTORS  
LIQUIDATION COMPANY GUC TRUST'S NOTICE OF PRESENTMENT AND  
APPLICATION FOR ORDER EXPUNGING CLAIMS FILED BY DANIEL VOGEL  
ADMINISTRATOR AD PROSEQUENDUM OF THE ESTATE OF LAURANA VOGEL,  
DANIEL VOGEL ADMINISTRATOR AD PROSEQUENDUM OF THE ESTATE OF  
ERIC VOGEL, MELISSA M. VOGEL, GREGORY VOGEL, BY HIS GUARDIAN AD  
LITEM DANIEL VOGEL AND INDIVIDUALLY, AND DANIEL VOGEL  
ADMINISTRATOR (CLAIM NUMBERS 1286, 1288, 1289, 59023, 59024, 59025, 59026,  
68484, 68485, 68486 AND 68487)**

The Motors Liquidation Company GUC Trust (the “**GUC Trust**”), formed by the above-captioned debtors (collectively, the “**Debtors**”) in connection with the Debtors’ Second Amended Joint Chapter 11 Plan, dated March 18, 2011, submits this certificate pursuant to the *Sixth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures* (the “**Case Management Order**”) (ECF. No. 10183), and respectfully represents:

1. On August 16, 2013, the GUC Trust filed the *Notice Of Presentment And Application For Order Expunging Claims Filed By Daniel Vogel Administrator Ad Prosequendum Of The Estate Of Laurana Vogel, Daniel Vogel Administrator Ad Prosequendum Of The Estate Of Eric Vogel, Melissa M. Vogel, Gregory Vogel, By His Guardian Ad Litem Daniel Vogel And Individually, And Daniel Vogel Administrator (Claim Numbers 1286, 1288, 1289, 59023, 59024, 59025, 59026, 68484, 68485, 68486 And 68487) (ECF No. 12493) (the “Claim Objection”)*.

2. The deadline for filing a response to the Claim Objection was September 18, 2013 at 12:00 p.m. (Eastern Time) (the “**Response Deadline**”). The presentment date and time on the Claim Objection, if no responses are timely filed and served, is scheduled for September 18, 2013 at 4:00 p.m. (Eastern Time).

3. The Response Deadline has passed and no response to the Claim Objection has been filed on the docket. Additionally, no party has indicated to the GUC Trust that it intends to oppose the relief requested in the Claim Objection.

4. An electronic copy of a proposed order (the “**Proposed Order**”) that is substantially in the form of the proposed order that was annexed to the Claim Objection will be submitted to the Court, along with this certificate.

5. The GUC Trust respectfully requests that the Proposed Order be entered without a hearing.

Dated: New York, New York  
September 18, 2013

/s/ Shaya M. Berger

Barry N. Seidel (BS-1945)

Shaya M. Berger (SB-5387)

DICKSTEIN SHAPIRO LLP

1633 Broadway

New York, New York 10019-6708

Telephone: (212) 277-6500

Facsimile: (212) 277-6501

Attorneys for Motors Liquidation  
Company GUC Trust